

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DAVID WARREN, et al.,

Defendants.

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CRIM. NO. JKB-22-439

MOTION FOR PROTECTIVE ORDER

The United States of America, by counsel, hereby requests a Protective Order and in support thereof states as follows:

1. The indictment charges the defendants with one count of racketeering conspiracy, in violation of 18 U.S.C. § 1962(d). The government wishes to provide discovery material. Some of the material may have personal identifiers including but not limited to social security numbers, birth dates, bank account numbers, home addresses of individuals, and/or similar information.

2. In the absence of a Protective Order, such personal identifiers must be redacted from discovery materials before they are produced to the defense, just as they must be redacted before documents are filed with the Court, *see* Fed. R. Crim. P. 49.1. However, due to the volume of material at issue, the process of redacting the documents will take so long that the provision of discovery to the defense will be significantly delayed.

3. In order to allow the government to produce the discovery materials in unredacted form, the parties request that this Court enter a Protective Order under Fed. R. Crim. P. 16(d)(1). For the convenience of the Court, a proposed Protective Order is attached hereto. This Protective Order will protect the privacy interests of any individuals whose personal identifiers are in the

discovery materials, without hampering defense counsel in the defense of this matter.

4. Counsel for the defendants have indicated they do not object to this motion.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: _____ /s/
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